

Colonel Kirk Gibbs  
District Engineer, Los Angeles District  
U.S. Army Corps of Engineers  
915 Wilshire Blvd, Suite 930  
Los Angeles, CA 90017-3489

Subject: Public Notice (PN) SPL-2003-00826-KAT for Phase 1 Villages at Vigneto, Benson,  
Cochise County, Arizona

Dear Colonel Gibbs:

Thank you for the opportunity to comment on the subject PN dated October 6, 2017 for the proposed Phase 1 Villages at Vigneto development located in Benson, Cochise County, Arizona. The applicant proposes to construct an 8,212-acre master planned community that would result in the permanent fill of 51 acres of waters of the United States (waters).

The following comments are prepared under the authority of, and in accordance with, the provisions of the Federal Guidelines (40 CFR 230) promulgated under section 404(b)(1) of the Clean Water Act (CWA). The §404 CWA permit was issued for the project (formerly known as Whetstone Ranch) on June 21, 2006 for a term of 20 years. The Corps is now conducting a permit re-evaluation while consulting with the U.S. Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act. Our concerns regarding the analysis of the project's

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12,399 acres of land including the 8,212 acre master-planned development to construct Villages at Vigneto. As part of the transaction, Whetstone Partners LLP transferred its 2006 §404 CWA permit to the applicant. The applicant proposes to expand the original project encompassing an additional 4,000 acres to construct the Villages at Vigneto. On July 18, 2016, the City of Benson approved the *Villages at Vigneto Final Community Master Plan and Development*.

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minimum 5-year monitoring period (40 CFR 230.96(b)). For the proposed offsite mitigation, we recommend performance standards related to hydrology, channel stability,

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Thank you for the opportunity to provide comments on the PN. As additional information becomes available on this proposal, please have your project manager contact Melissa Scianni at (213) 244-1817.

Sincerely,

Jason Brush  
Manager, Wetlands Section

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